

**23 MAG 6828**

UNITED STATES OF AMERICA

v.

ANGELICA CHARLES,

Defendant.

**SEALED COMPLAINT**

Violation of 18 U.S.C. § 111(a)(1) and (b)

COUNTY OF OFFENSE:  
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

TAD CONKLIN, being duly sworn, deposes and says that he is a U.S. Postal Inspector with the U.S. Postal Inspection Service (“USPIS”), and charges as follows:

**COUNT ONE**  
**(Assault)**

1. On or about August 27, 2023, in the Southern District of New York and elsewhere, ANGELICA CHARLES, the defendant, knowingly and forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a person designated in Title 18, United States Code, Section 1114, while the person was engaged in and on account of the performance of official duties, and in doing so, made physical contact with the victim of the assault and inflicted bodily injury, to wit, CHARLES forcibly hit an employee of the United States Postal Service at 70 West 164th Street in the Bronx, New York.

(Title 18, United States Code, Section 111(a)(1) and (b).)

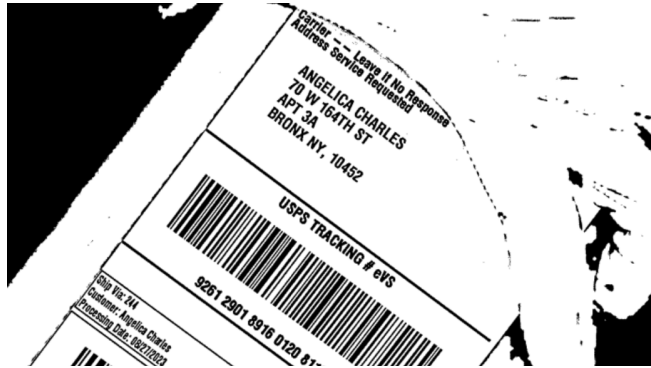
The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a U.S. Postal Inspector with USPIS, and I have been personally involved in the investigation of this matter. This affidavit is based upon my investigation, my conversations with the victim, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my participation in this investigation, my review of law enforcement reports and records, my conversations with the victim and other law enforcement officers, and my review of surveillance video, I have learned, among other things, the following:

a. On or about August 27, 2023, at approximately 8:20 a.m., a mail carrier employed by the United States Postal Service (“Victim-1”) was delivering a package to a residential building in the Bronx located at the corner of West 164th Street and Woodycrest

Avenue (“Building-1”).<sup>1</sup> The package, which is pictured below, was addressed to “Angelica Charles.”



b. Victim-1 rang the doorbell to obtain entry to Building-1, and then took the elevator to the third floor. After delivering the package to the apartment listed on the package slip, she was confronted by ANGELICA CHARLES, the defendant, who exited the apartment and began shouting at Victim-1 for ringing the doorbell.

c. CHARLES then followed Victim-1 into the elevator, struck Victim-1 in the face, and slammed Victim-1's head against the elevator wall, tearing out a piece of Victim-1's hair. CHARLES exited the elevator on another floor, then returned up the stairs to the third floor and again confronted Victim-1 as she attempted to exit the elevator.

d. CHARLES followed Victim-1 back onto the elevator, and threatened to continue to follow Victim-1 until Victim-1 left the building. As Victim-1 exited the residential building via the main entrance, she turned and took a photograph of CHARLES. Victim-1 also told CHARLES that she would be calling the police to report the assault. Below is the photograph that Victim-1 took of CHARLES.

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<sup>1</sup> Building-1, which is located at the corner of West 164th Street and Woodycrest Avenue, is listed under two addresses: 70 West 164th Street, and 990 Woodycrest Avenue.



e. Minutes after Victim-1 left the building, CHARLES returned to her apartment on the third floor, placed two children into a stroller, and then carried the stroller down the stairs to the first floor, where she fled the building through a side exit. Below is a still image from surveillance video capturing CHARLES fleeing the scene before police arrived.



f. On or about August 27, 2023, Victim-1 was taken to the emergency room to receive treatment for the injury to her head and neck caused by CHARLES assaulting her.

4. Based on my participation in this investigation, my review of law enforcement reports and records, my review of Building-1's records, and my conversations with other law enforcement officers, I have learned, among other things, the following:

a. As of August of 2023, "Angelica Charles" is listed in a lease agreement with Building-1 as a tenant in Apartment 3A.

b. Following the assault, an NYPD officer showed Victim-1 a photo array containing, among other photos, a photograph of ANGELICA CHARLES, the defendant. During the photo array, Victim-1 identified ANGELICA CHARLES as the individual who assaulted her.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of ANGELICA CHARLES, the defendant, and that she be arrested, and imprisoned or bailed, as the case may be.

/s/ Tad Conklin, by the Court, with permission  
TAD CONKLIN  
Postal Inspector  
U.S. Postal Inspection Service

Sworn to me through the transmission of  
this Complaint by reliable electronic  
means (telephone), this 16 day of October, 2023.



JAMES L. COTT  
United States Magistrate Judge